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## EXHIBIT C

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SARAH GILVARY : COURT OF COMMON PLEAS : OF PHILADELPHIA COUNTY

Plaintiff, :

v. : March Term, 2007, No. 3736

GENERAL MOTORS CORPORATION

and POMPEY DODGE, INC.,

:

Defendants. :

## NOTICE OF BANKRUPTCY

PLEASE TAKE NOTICE that, on June 1, 2009, (the "Commencement Date"), General Motors Corporation and certain of its subsidiaries filed a voluntary petition seeking bankruptcy protection under chapter 11 of title 11 of the United States Code (11 U.S.C. § 101 *et seq.*) ("Bankruptcy Code") in the United States Bankruptcy Court for the Southern District of New York ("Bankruptcy Court"). The bankruptcy case has been assigned Case No. 09-50026 (REG). A copy of GM's chapter 11 petition is attached hereto as Exhibit A.

PLEASE BE ADVISED that, as of the Commencement Date, any new or further action against GM is stayed pursuant to section 362 of the Bankruptcy Code (the

09-50026-mg Doc 4541-3 Filed 11/25/09 Entered 11/25/09 11:33:20 Exhibit state court bkrptcy deferral Pg 3 of 3

"Automatic Stay"), which provides that the filing of the petition, among other things,

"operates as a stay, applicable to all entities, of ...the commencement or continuation,

including the issuance or employment of process, of a judicial, administrative, or other

action or proceeding against the debtor that was or could have been commenced before

the commencement of the case under this title, or to recover a claim against the debtor

that arose before the commencement of the case under this title ...." and of "any act to

obtain possession of property of the estate or of property from the estate or to exercise

control over property of the estate." 11 U.S.C. § 362(a)(1) & 362(a)(3).

PLEASE BE FURTHER ADVISED that any action taken against GM without

obtaining relief from the Automatic Stay from the Bankruptcy Court may be void ab

initio and may result in a finding of contempt against Plaintiffs. GM reserves and retains

its statutory right to seek relief in the Bankruptcy Court from any judgment, order, or

ruling entered in violation of the Automatic Stay.

ECKERT SEAMANS CHERIN & MELLOTT, LLC

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Dated: June 8, 2009

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